

## **EXHIBIT 17**

### **Compliance with Multiple Ownership Requirements**

By this application, the parties seek the Commission's consent to the assignment of the licenses of television broadcast stations KMYT-TV, Tulsa, Oklahoma (Facility ID No. 54420), and KOKI-TV, Tulsa, Oklahoma (Facility ID No. 11910), from Newport Television License LLC ("Newport") to KTVU, Inc. ("Cox").<sup>1</sup>

**Local Television Ownership Rule:** Nielsen Media Research assigns both KMYT-TV and KOKI-TV to the Tulsa, Oklahoma DMA. Section 73.3555(b) of the Commission's rules permits common ownership of two TV stations within the same DMA (1) if, following the transaction, at least eight independently-owned and operating full-power commercial and noncommercial TV stations will remain in the DMA and (2) if at least one of the two commonly owned TV stations is not among the top-four ranked TV stations in the DMA based on the most recent all-day (9 a.m.-midnight) audience share percentages at the time the application is filed, as measured by a professional rating service such as Nielsen Media Research.

Newport currently owns and operates both KMYT-TV and KOKI-TV in the Tulsa, Oklahoma DMA. As shown below, assignment intact of Newport's duopoly in this market to Cox would comply with both prongs of the Commission's TV duopoly standard.

- **Independent Television Voices:** Attachment 1 hereto lists the full-power, operational independently-owned commercial and noncommercial television stations that will remain in the Tulsa, Oklahoma DMA after Cox's acquisition of KMYT-TV and KOKI-TV. As Attachment 1 shows, ten (10) full-service, independent television voices would remain in the Tulsa, Oklahoma DMA following the consummation of the proposed transaction.
- **No More than One Top-4 Station in the Proposed Combination:** Based on the May 2012 Nielsen NSI audience survey, Newport's Fox-affiliated KOKI-TV is the fourth (4<sup>th</sup>) ranked television station in the Tulsa, Oklahoma DMA and Newport's MyTV-affiliated KMYT-TV is the sixth (6<sup>th</sup>) ranked television station in the Tulsa, Oklahoma DMA based on Nielsen's all-day (9 a.m.-midnight) audience share rankings, the most recently available Nielsen rankings at the time of the filing of the instant application.<sup>2</sup>

Cox's acquisition of Newport's Tulsa duopoly accordingly complies with Section 73.3555(b).

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<sup>1</sup> KTVU, Inc. has been substituted for KTVU, LLC, which was initially proposed as the assignee. KTVU, Inc. owns and controls KTVU, LLC, and is the immediate parent entity of KTVU, LLC.

<sup>2</sup> In determining the number of independent television voices, the Commission's rules provide for the counting only of those stations whose Grade B contours overlap the Grade B contour of at least one of the stations in the proposed combination. The predicted noise-limited digital coverage contours of KOKI-TV and KMYT-TV have substantial overlap with the predicted noise-limited contours of each of the other full-service television broadcast stations in the Tulsa, Oklahoma DMA and listed on Attachment 1, as shown by the contour study prepared by Du Treil, Lundin & Rackley, Inc., that is attached as Attachment 3.

**Radio-Television Cross-Ownership Rule:** Pursuant to previously granted consents and authorizations by the Commission, Cox subsidiaries hold five radio broadcast stations in the Tulsa, Oklahoma Arbitron Metro Market: KSJR(FM), KRAV(FM), KRMG-FM, and KWEN(FM), all licensed to Tulsa, Oklahoma, and KRMG(FM), licensed to Sandy Springs, Oklahoma. Section 73.3555(c)(2) of the Commission's rules permits a single entity to own, operate, or control up to two (2) commercial TV stations and up to six (6) commercial radio stations in the same market if at least twenty (20) independently owned media voices would remain in the market after the acquisition.

As shown in Attachment 1, the Tulsa, Oklahoma DMA includes ten (10) independent television voices. Attachment 2 includes the BIA/Kelsey report for the Tulsa, Oklahoma Arbitron Metro Market, the radio metro market that includes the community of license of the television stations to be acquired. Attachment 2 shows sixteen (16) independent radio voices in the Tulsa market, excluding Cox. Thus, without even considering cable television and newspaper independent media voices, the Tulsa market has well over twenty (20) independent television and radio media voices. Cox therefore may hold its five (5) radio stations in the Tulsa market together with television stations KOKI-TV and KMYT-TV in compliance with Section 73.3555 of the Commission's rules.

**ATTACHMENT 1**

**Full-Power, Operational and Independently-Owned TV Stations Licensed to Communities in the Tulsa, OK DMA  
(Sources: Television and Cable Factbook 2010 and FCC CDBS Database)**

<b><u>Station Count</u></b>	<b><u>Station</u></b>	<b><u>Channel (Network)</u></b>	<b><u>Community of License</u></b>	<b><u>Licensee</u></b>
<b>1.</b>	KTUL (35685)	10 (ABC)	Tulsa, OK	KTUL, LLC (Albritton Communications Company)
<b>2.</b>	KMYT-TV (54420)	42 (MNT)	Tulsa, OK	Newport Television License, LLC
	KOKI-TV (11910)	22 (FOX)	Tulsa, OK	Newport Television License, LLC
<b>3.</b>	KJRH-TV (59439)	8 (NBC)	Tulsa, OK	Scripps Media, Inc.
<b>4.</b>	KOTV-DT (35434)	45 (CBS)	Tulsa, OK	Griffin Licensing, L.L.C.
	KQCW-DT (78322)	20 (CW)	Muskogee, OK	Griffin Licensing, L.L.C.
<b>5</b>	KTPX-TV (7078)	28 (ION)	Okmulgee, OK	ION Media Tulsa License, Inc. (ION Media Networks, Inc.)
<b>6.</b>	KWHB (37099)	47 (IND)	Tulsa, OK	Le Sea Broadcasting of Tulsa, Inc. (LeSea Broadcasting Corp.)
<b>7.</b>	KRSC-TV* (57431)	36 (ETV)	Claremore, OK	Board Of Regents of Oklahoma Colleges
<b>8.</b>	KOED-TV* (66195)	11 (ETV)	Tulsa, OK	Oklahoma Educational Television Authority
	KOET * (50198)	31 (ETV)	Eufaula, OK	Oklahoma Educational Television Authority
<b>9.</b>	KDOR-TV (1005)	17 (TBN)	Bartlesville, OK	TCCSA, INC., D/B/A Trinity Broadcasting Network (Trinity Broadcasting Network, Inc.)
<b>10.</b>	KGEB (24485)	49 (IND)	Tulsa, OK	University Broadcasting, Inc.

\* Non-Commercial Educational Television Stations

**ATTACHMENT 2**

**BIA/Kelsey Report Showing  
Radio Broadcast Stations Classified as in the  
Tulsa, Oklahoma Arbitron Metro Market**

# FCC Geographic Market Definition for Tulsa, OK

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KAKC	AM	1300	C	Sports	Tulsa, OK	07/02/2003	66	Clear Channel Communications Inc	Tulsa, OK	Tulsa
KBEZ	FM	92.9	C	Bob	Tulsa, OK	07/02/2003	66	Journal Broadcast Group Inc	Tulsa, OK	Tulsa
KCFO	AM	970	C	Talk	Tulsa, OK	07/02/2003	66	Friendship Broadcasting LP	Tulsa, OK	Tulsa
KCXR	FM	100.3	C	ChrsContem	Tulsa, OK	11/30/2009	66	Stephens Family Limited Partnership	Taft, OK	Muskogee
KDIM	FM	88.1	NC	Cct/Cst/Tik	Tulsa, OK	05/04/2005	66	Creative Educational Media Corp Inc	Coweta, OK	Wagoner
KEMX	FM	94.5	C	ChrsContem	Tulsa, OK	07/02/2003	66	Stephens Family Limited Partnership	Locust Grove, OK	Mayes
KEOR	AM	1120	C	Urban AC	Tulsa, OK	08/09/2006	66	p La Zeta 95.7 Inc	Catoosa, OK	Rogers
KFAQ	AM	1170	C	Talk/News	Tulsa, OK	07/02/2003	66	Journal Broadcast Group Inc	Tulsa, OK	Tulsa
KGTO	AM	1050	C	R&B Oldies	Tulsa, OK	07/02/2003	66	Perry Broadcasting Company Inc	Tulsa, OK	Tulsa
KHTT	FM	106.9	C	Top 40	Tulsa, OK	07/02/2003	66	Journal Broadcast Group Inc	Muskogee, OK	Muskogee
KIZS	FM	101.5	C	Span/Oldes	Tulsa, OK	07/02/2003	66	Clear Channel Communications Inc	Collinsville, OK	Tulsa
KJMM	FM	105.3	C	Urban	Tulsa, OK	07/02/2003	66	Perry Broadcasting Company Inc	Bixby, OK	Tulsa
KJMU	AM	1340	C	DARK	Tulsa, OK	07/02/2003	66	Birach Broadcasting Corporation	Sand Springs, OK	Tulsa
KJSR	FM	103.3	C	Clsc Rock	Tulsa, OK	07/02/2003	66	Cox Media Group	Tulsa, OK	Tulsa
KMOD	FM	97.5	C	AOR	Tulsa, OK	07/02/2003	66	Clear Channel Communications Inc	Tulsa, OK	Tulsa
KMUS	AM	1380	C	Mexican	Tulsa, OK	07/02/2003	66	p Perez, Antonio	Sperry, OK	Tulsa
KMYZ	FM	104.5	C	Alternative	Tulsa, OK	07/02/2003	66	Times-Shamrock Communications Inc	Pryor, OK	Mayes
KNYD	FM	90.5	NC	Cct/Cst/Tik	Tulsa, OK	07/02/2003	66	Creative Educational Media Corp Inc	Broken Arrow, OK	Tulsa
KOSG	FM	103.9	C	Gospel	Tulsa, OK	07/02/2003	66	Tallgrass Broadcasting LLC	Pawhuska, OK	Osage
KPGM	AM	1500	C	Chrst/Talk	Tulsa, OK	07/02/2003	66	Potter, Kevin & Dorea	Pawhuska, OK	Osage
KRAV	FM	96.5	C	AC	Tulsa, OK	07/02/2003	66	Cox Media Group	Tulsa, OK	Tulsa
KREK	FM	104.9	C	Country	Tulsa, OK	07/02/2003	66	Big Chief Broadcasting of Bristow	Bristow, OK	Creek
KRMG	AM	740	C	News/Talk	Tulsa, OK	07/02/2003	66	Cox Media Group	Tulsa, OK	Tulsa
KRMG	FM	102.3	C	News/Talk	Tulsa, OK	07/02/2003	66	Cox Media Group	Sand Springs, OK	Tulsa
KRSC	FM	91.3	NC	Info/Altve	Tulsa, OK	07/02/2003	66	University of Oklahoma Board of Regents/Rogers	Claremore, OK	Rogers
KRVT	AM	1270	C	Mexican	Tulsa, OK	07/02/2003	66	p Gaytan-Galvan LLC	Claremore, OK	Rogers
KTBT	FM	92.1	C	Rhymc/CHR	Tulsa, OK	07/02/2003	66	Clear Channel Communications Inc	Broken Arrow, OK	Tulsa
KTBZ	AM	1430	C	Sports	Tulsa, OK	07/02/2003	66	Clear Channel Communications Inc	Tulsa, OK	Tulsa
KTFR	FM	100.7	C	ChrsContem	Tulsa, OK	07/02/2003	66	Stephens Family Limited Partnership	Chelsea, OK	Rogers
KTGX	FM	106.1	C	Adult Hits	Tulsa, OK	07/02/2003	66	Clear Channel Communications Inc	Owasso, OK	Tulsa
KTSO	FM	94.1	C	Clsc Hits	Tulsa, OK	02/04/2004	66	Times-Shamrock Communications Inc	Glenpool, OK	Tulsa
KVOO	FM	98.5	C	Country	Tulsa, OK	07/02/2003	66	Journal Broadcast Group Inc	Tulsa, OK	Tulsa
KWEN	FM	95.5	C	Country	Tulsa, OK	07/02/2003	66	Cox Media Group	Tulsa, OK	Tulsa
KWGS	FM	89.5	NC	Nws/Tik/Inf	Tulsa, OK	07/02/2003	66	University of Tulsa	Tulsa, OK	Tulsa

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

## FCC Geographic Market Definition for Tulsa, OK

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KWTU	FM	88.7	NC	Classical	Tulsa, OK	11/10/2004	66	University of Tulsa	Tulsa, OK	Tulsa
KXBL	FM	99.5	C	Country	Tulsa, OK	07/02/2003	66	Journal Broadcast Group Inc	Henryetta, OK	Okmulgee
KXOJ	FM	100.9	C	ChrsContem	Tulsa, OK	07/02/2003	66	Stephens Family Limited Partnership	Sapulpa, OK	Creek
KXTD	AM	1530	C	Span/Chrst	Tulsa, OK	07/02/2003	66	Gaytan-Galvan LLC	Wagoner, OK	Wagoner
KYAL	FM	97.1	C	Sports	Tulsa, OK	08/03/2006	66	Stephens Family Limited Partnership	Muskogee, OK	Muskogee
KYAL	AM	1550	C	Sports	Tulsa, OK	07/02/2003	66	Stephens Family Limited Partnership	Sapulpa, OK	Creek
KZLI	AM	1570	C	Span/Varty	Tulsa, OK	07/02/2003	66	p Gaytan-Galvan LLC	Catoosa, OK	Rogers

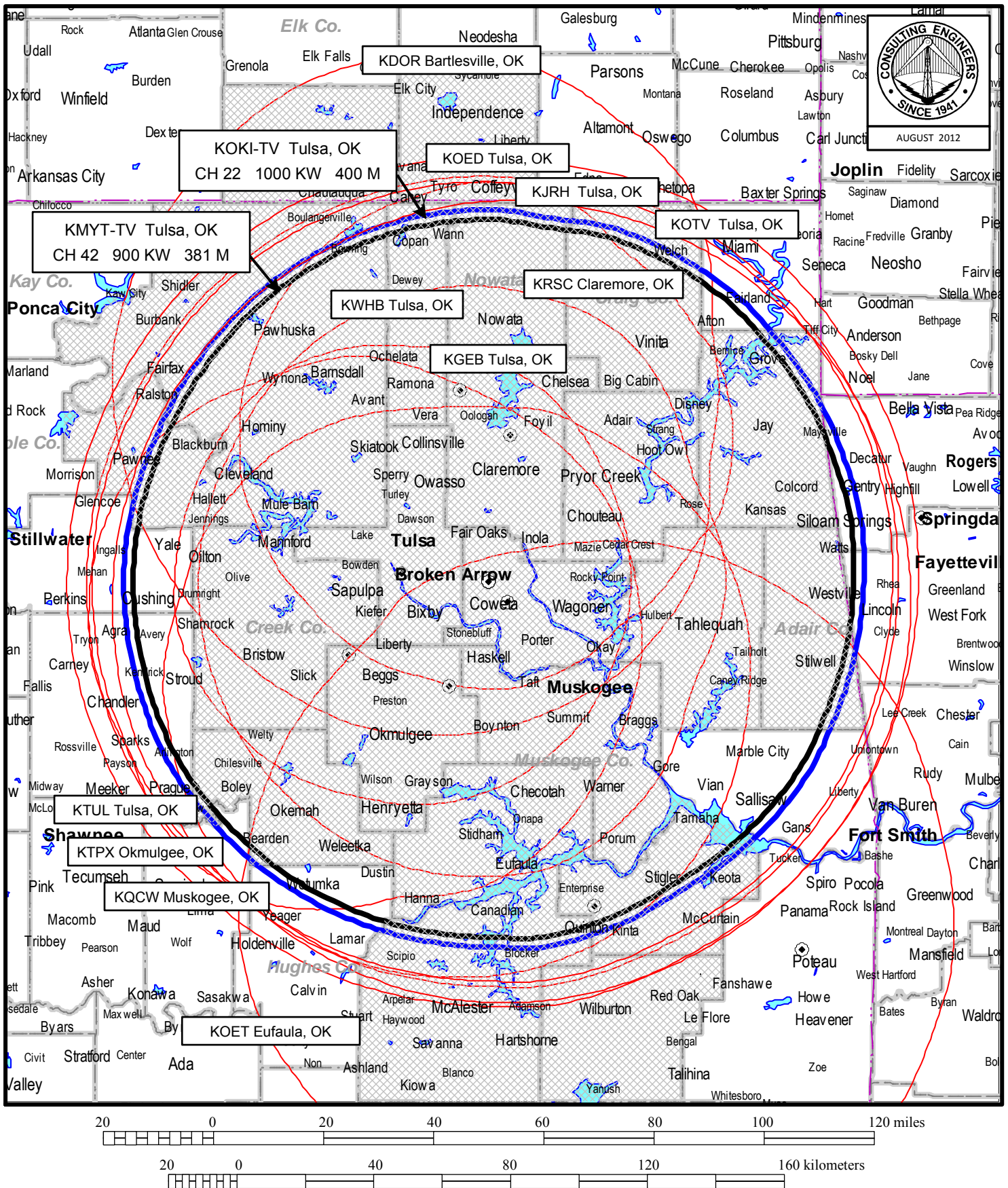
**Number of Stations in Geographic Market 41**

### Previous Stations in Geographic Market

KBIX	AM	1490	C	Sports		05/12/2006	0	Stephens Family Limited Partnership	Muskogee, OK	Muskogee
KOSN	FM	107.5	NC	Nws/Tlk/Cls		02/02/2005	0	Public Radio Capital Inc	Ketchum, OK	Craig

**ATTACHMENT 3**

**Map and Contour Study  
Prepared By Du Treil, Lundin & Rackley Depicting  
Predicted Noise-Limited Contours of  
Each of the Full-Service Television Broadcast Stations in the  
Tulsa, Oklahoma DMA**



# **FCC PREDICTED NOISE-LIMITED COVERAGE CONTOURS OF FULL-SERVICE TELEVISION STATIONS IN TULSA DMA**

PREPARED FOR  
**COX MEDIA GROUP**

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